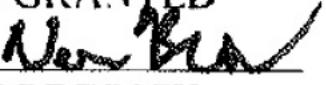


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APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J. 09/15/2023

September 14, 2023

Extension is granted until October 17, 2023.

Via ECF

The Honorable Vernon S. Broderick
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Rodriguez v. Edison's Restaurant et al
Civil Action No. 1:22-cv-01909-VSB

Dear Judge Broderick:

Our office represents Plaintiff in the above-captioned matter, and we submit this letter to request a brief extension of Plaintiff's time to file the terms of the settlement ("Settlement Terms"), joint letter ("Letter") explaining why the settlement is fair and reasonable, and contemporaneous billing records ("Records"). We are requesting an extension from the original deadline of September 17, 2023 to October 17, 2023. This is Plaintiff's first request for an extension of this deadline. Opposing counsel, Mr. Michael Samuel, has provided his consent to the request for an extension.

Plaintiff seeks this extension of time to file the Settlement Terms, Letter, and Records in order to allow our office sufficient time to translate the contents of the Settlement Terms with Plaintiff from English into Spanish, have Plaintiff sign the Settlement Terms, and provide opposing counsel time to review and approve once the document is signed and executed. Accordingly, we respectfully request that Plaintiffs' time to file the Settlement Terms, Letter, and Records be extended until October 17, 2023.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/ Eliseo Cabrera
Eliseo Cabrera

Cc: All Counsel of Record (via ECF)